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REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

June 28, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**
WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information - Subject to Protective Order Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Santa Rosa Telephone Cooperative, Inc. (the Cooperative), Study Area Code 442141 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Cooperative's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress

report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Santa Rosa Telephone Cooperative, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

Five-Year Service Quality Improvement Plan Progress Report

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Santa Rosa Telephone Cooperative, Inc. requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative maintains as confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Cooperative's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Cooperative's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a map of the Cooperative's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Cooperative does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Cooperative's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Santa Rosa Telephone Cooperative, Inc. seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Santa Rosa Telephone Cooperative, Inc.] is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

¹ *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 (rel. Mar. 22, 2016).

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED - FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,



Jason Tole, Assistant GM/CFO
Authorized Representative for
Santa Rosa Telephone Cooperative, Inc.

Enclosures

cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division
Ms. Naomie Hudgins, Public Utility Commission

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Jason Tole
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9488662217 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jason.tole@rocces.net
Form Type		54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Toie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.toie@scaccc.org.net

<110> Has your company received its ETC certification from the FCC?
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5
year plan" filed with the FCC?

(yes / no) ☒ ☐

(yes / no) ☐ ☐

If your answer to Line <111> is yes, please file a progress report, on line
<112> delineating the status of your company's existing § 54.202(a) "5 year
plan" on file with the FCC, as it relates to your provision of voice telephony
service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years,
your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a
CETC which only receives frozen support, your progress report is only
required to address voice telephony service.

442141TXILEC112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm
that the attached document(s), on line 112, contains a progress report on its five-year
service quality improvement plan pursuant to §54.202(a). The information shall be
submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
<114> Report how much universal service (USF) support was received
<115> How much (USF) was used to improve service quality and how support was used to improve service quality
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
<118> Provide an explanation of network improvement targets not met
in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<210> For the prior calendar year, were there any reportable voice service outages?

[illegible]

(300) Unfulfilled Service Request Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
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<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Toie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.toie@arcaccess.net
<300>	Unfulfilled service request (voice)	0
<310>	Detail on attempts (voice)	
<320>	Unfulfilled service request (broadband)	0
<330>	Detail on attempts (broadband)	

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442131
<015>	Study Area Name	STATE OF OKLA TEL (100)
<020>	Program Year	2013
<030>	Contact Name - Person USAC should contact regarding this data	James T. Lee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9184662213 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	jlee@oktel.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <div>Offered only fixed voice</div>	
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <div>Offered only fixed broadband</div>	
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

(600) Functionality in Emergency Situations
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	442341
<015> Study Area Name	PANTZ PMA T11 1000
<020> Program Year	2011
<030> Contact Name - Person USAC should contact regarding this data	James Thila
<035> Contact Telephone Number - Number of person identified in data line <030>	408662217 ext
<039> Contact Email Address - Email Address of person identified in data line <030>	james.thila@pma.t11.ec610.mil
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality In Emergency Situations	442341TX11.EC610.pdf

FCC Form 481
OMB Control #
July 2013

1/1/2016	
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[illegible]

FCC Form 481
OMB Control No.
July 2013

[illegible]

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Toie
<035>	Contact Telephone Number - Number of person identified in data line <030>	940862217 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.toie@sraa.com.net
<810>	Reporting Carrier	Santa Rosa Telephone Cooperative, Inc.
<811>	Holding Company	Santa Rosa Telephone Cooperative, Inc.
<812>	Operating Company	Santa Rosa Telephone Cooperative, Inc.

[illegible]

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA YEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	Contact Telephone Number - Number of person identified in data line <030>	940862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.tole@arcaccess.net
<900>	Does the filing entity offer tribal land and services? (Y/N)	No

<900> Does the filing entity offer tribal land services? (Y/N)

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes/No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
<922>	Feasibility and sustainability planning;
<923>	Marketing services in a culturally sensitive manner;
<924>	Compliance with Rights of way processes
<925>	Compliance with Land Use permitting requirements
<926>	Compliance with Facilities Siting rules
<927>	Compliance with Environmental Review processes
<928>	Compliance with Cultural Preservation review processes
<929>	Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.tole@rcaccess.net

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	442141TXILEC1010.pdf
<1020>	Broadband comparability certification	Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	442141TXILEC1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	Contact Telephone Number - Number of person identified in data line <030>	940862217 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.tole@arcaccess.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g)

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Toie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408662217 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.toie@srcaccess.net

442141TXILEC1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <https://srcaccess.net>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:



<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tola
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408662217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.tola@carcaccess.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1

2016 certification, this applies to Round 2 recipients of Incremental Support

<2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1

2016 certification, this applies to Round 1 recipients of Incremental Support

<2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A> Round 2 Recipient of Incremental Support?

<2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.

<2025A> Round 1 or Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(iii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.tole@srcaccess.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Milestone Certification (47 CFR § 54.313(f)(1)(i))

442141TXILEC3010.pdf

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Not Applicable - No Attachment Required

(3012B) Please Provide Attachment

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

☒ ☐

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☒ ☐

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

442141TXILEC3017.pdf

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☐ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

Data Collection Form

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Toie
<035>	Contact Telephone Number - Number of person identified in data line <030>	940862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	Jason.Toie@roscocorp.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2012
<030>	Contact Name - Person USAC should contact regarding this data	James Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	44-880-211 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	James.Taylor@telcoop.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	442141
<015> Study Area Name	SANTA ROSA TEL COOP
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Jason Tole
<035> Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jason.tole@srcaccess.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: SANTA ROSA TEL COOP	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2016
Printed name of Authorized Officer: JASON TOLE	
Title or position of Authorized Officer: ASSISTANT GM/CPO	
Telephone number of Authorized Officer: 9408862217 ext. 14	
Study Area Code of Reporting Carrier: 442141	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC Form 481
OMB Control No. 3050-0986/OMB Control No. 3060-0819
July 2013

442141

SANTA ROSA TEL. 0008

2017

Jagson Tola

940886221 ext.

1280N.T01035XC22CCCSF.N04E

1/1/2016

1

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

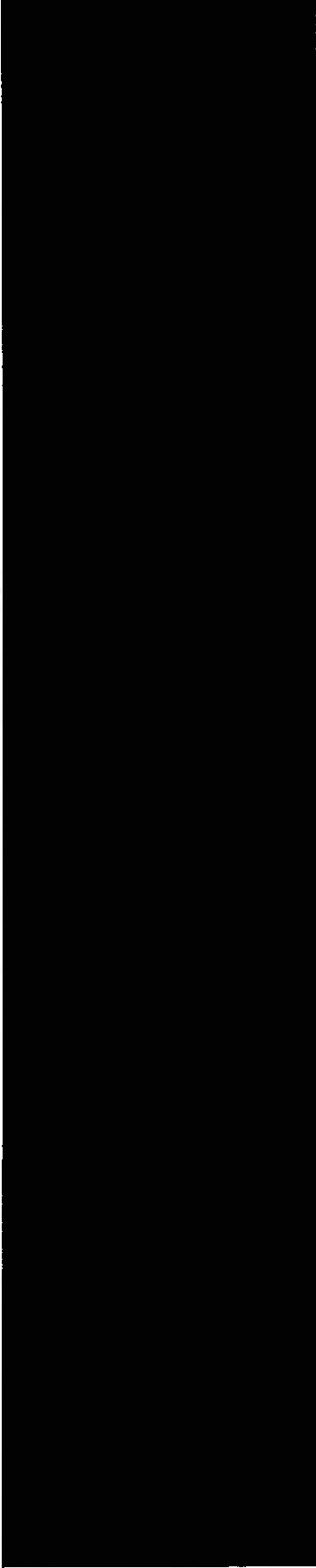
<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Toie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.toie@earthaccess.net

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason.tole@arcaccess.net
<810>	Reporting Carrier	Santa Rosa Telephone Cooperative, Inc.
<811>	Holding Company	Santa Rosa Telephone Cooperative, Inc
<812>	Operating Company	Santa Rosa Telephone Cooperative, Inc.

[illegible]



Voice Network Upgrades : 2017

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Estimated Capital Costs
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Voice Network Upgrades: 2017

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Estimated Capital Costs
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Broadband Upgrades: 2017

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served	Estimated Capital Costs
---------------------	-------------------------------	-------------------------	---------------------------------	-----------------------------------	----------------------------

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SANTA ROSA TELEPHONE COOP., INC.
SERVICE QUALITY
REPORTING MAP

TEXAS 2016
CEE VEE CROWELL
GOODLETT, CHARLIE
KIRKLAND, LAKE KEMP,
MEDICINE MOUND,
ODELL, OKLAUNION,
THALIA, AND
TRUSCOTT
WIRECENTER
BOUNDARIES

N
A

REDACTED – FOR PUBLIC INSPECTION

SANTA ROSA TELEPHONE - 442141

CapEx

2110 Land & General Support

2210 Central Office Switching

2230 Central Office Transmission

2410 Cable & Wire Facilities

Total Capital Expenditures

OpEx

Plant Specific

Plant Nonspecific

Depreciation

Customer Operations

Corporate Operations

Total Operating Expenses

USF YTD (1/15 - 6/15)

Total USF YTD

USF BreakOut

CapEx USF

OpeEx USF

REDACTED - FOR PUBLIC INSPECTION

Response Line 510
SANTA ROSA TELEPHONE COOPERATIVE, INC.
Study Area 442141

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) SANTA ROSA TELEPHONE COOPERATIVE, INC. ("SRTC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. SRTC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. SRTC also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at www.santarosatelco.com which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition SRTC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

SRTC also outlines its rates, terms, and conditions under which SRTC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. SRTC keeps its tariffs available for public inspection at its business offices.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) CLEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. SRTC trains staff on applicable rules for broadband services issues on an annual basis. In addition SRTC has placed on its website at www.santarosatelco.com its network practices and policies regarding FCC's Net Neutrality Rules.

SRTC also outlines its rates, terms, and conditions under which SRTC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
SANTA ROSA TELEPHONE COOPERATIVE, INC.
Study Area 442141

Functionality in Emergency Situations:

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) SANTA ROSA TELEPHONE COOPERATIVE, INC. ("SRTC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to SRTC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power. In addition, SRTC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. SRTC also has SONET, DWDM, and ATM technology deployed in its core fiber optic network that is a self-healing and will automatically reroute traffic should a fiber cut occur. SRTC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. SRTC also has proper staff in place to repair any fiber cuts in a timely manner. SRTC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. SRTC has developed and trained its staff on network preparedness plans in case of emergency situations. SRTC is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) SANTA ROSA TELEPHONE COOPERATIVE, INC. ("SRTC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to SRTC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, SRTC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. SRTC also has SONET, DWDM, and ATM technology deployed in its core fiber optic network that is a self-healing and will automatically reroute broadband traffic should a fiber cut occur. SRTC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. SRTC also has proper staff in place to repair any fiber cuts in a timely manner. SRTC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. SRTC has developed and trained its staff on network preparedness plans in case of emergency situations.

Response to Line 1010
Santa Rosa Telephone Cooperative, Inc.
Study Area 442141

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Santa Rosa Telephone Cooperative, Inc. ("SRTC") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. SRTC's current total local end-user rate¹ of \$18.59 (which includes a local fee of \$14.50-\$18.00 and surcharges and any EAS) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response to Line 1030
Santa Rosa Telephone Cooperative, Inc.
Study Area 442141

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (1) Santa Rosa Telephone Cooperative, Inc. ("SRTC") charges a residential rate of \$69.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

¹ *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

Santa Rosa Telephone Cooperative, Inc.

Terms and Conditions of Service

Vernon Office
1-888-886-2217
M-F 8:30-5:00

Seymour Office
1-877-889-1125
M-F 8:00-5:00

Haskell Office
1-888-863-1125
M-F 8:00-5:00

☐ Customer Rights Information

You have been provided with a telephone directory that includes Customer Rights information and other important telephone information. Every six months you will receive a bill insert directing you to that information.

☐ Lifeline and Tel-Assistance Services

Special reduced rates are available to some customers that qualify based on limited income and or disability. Please call our office for more information.

☐ Descriptions of Services and Charges

Descriptions of the service to which you have subscribed will be presented to you. You have also been provided with a list of the monthly charges for each service to which you have subscribed, and have been informed of the lowest-priced alternative plans available.

The installation fees are one-time non-recurring charges that are not refundable. You will not be required to pay a deposit if a letter of credit from your previous company is provided; or if you are an applicant who is sixty-five (65) years of age or older. If a deposit is required it will be returned with interest after 12 months of paying your telephone bill on time for residential service and 24 months for business service. Any construction charges applicable to your service have been explained to you.

Your membership entitles you to accrue capital credits with the Cooperative, but the Cooperative must make a profit before capital credits are allocated.

☐ Other Charges

Your first bill may also include a prorated amount for the first month of service. Surcharges and taxes on your bill are also assessed each month as a percent of revenue and remitted to the appropriate agency or authority. The Cooperative will charge \$25 for each returned check. If service is disconnected for non-payment a minimum service restoration charge will apply to have service restored.

☐ Billing Cycle

Charges for local service are billed one month in advance. Long distance charges are usually billed one-half to one and one-half months after calls have been made. Your bill is mailed by the 1st of every month, and is due upon arrival. Your payment is considered past due if not paid by the 16th day after issuance.

☐ Cancellation Policy

If service is canceled after the service is installed you will be responsible for the non-recurring installation charges, which will not be refunded.

☐ Contracts and Right of Cancellation

If your service requires a term contract, the minimum contract service terms have been provided to you. Also, if the term of the contract is longer than 31 days, you have six business days from the time the terms and conditions information is sent to you to cancel the contract without penalty or fee.

☐ Anti-Discrimination Policy

Cooperative services are provided without discrimination as to a customer's race, color, sex, nationality, religion, marital status, income level, source of income, or from unreasonable discrimination on the basis of geographic location.

This information is available in Spanish. Esta informacion es disponible Espanol.

Santa Rosa Communications, L.T.D.

Terms and Conditions of Service

Descriptions of Services and Charges

Descriptions and a list of the monthly charges for service to which you have subscribed are furnished for your information. The installation fees are one-time non-recurring charges that are not refundable. If a deposit is required it will be returned with interest after 12 months of paying your telephone bill on time for residential service and 24 months for business service.

Other Charges

Your first bill may also include a prorated amount for the first month of service. Surcharges and taxes on your bill are also assessed each month as a percent of revenue and remitted to the appropriate agency or authority. If service is disconnected for non-payment a minimum service restoration charge will apply to have service restored.

SRC Long Distance

Service Plans

Residential Flat Rate: \$0.10 / minute One Rate: \$4.95 plus \$0.07 / minute Volume Discount Rates: Varies \$0.07 to \$0.11 / min 48 States: \$30.00 / month Includes 48 contiguous states	Residential Peak/Off Peak Plan: Peak: \$0.11/min 7 a.m. – 6:59 p.m. M - F Off Peak: \$0.09/min All other times	Business Peak/Off Peak Plan: Peak: \$0.13/min 7 a.m. – 6:59 p.m. M - F Off Peak: \$0.11/min All other times	Business Flat Rate: \$0.12 / minute One Rate: \$4.95 plus \$0.09 / minute Volume Discount Rates: Varies \$0.07 to \$0.13 / min
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PIC Freeze

A Preferred Carrier Freeze is available to sign, so Santa Rosa Telephone Coop, Inc. will not change the carrier providing service without your direct authorization by verbal or written request.

Toll Free Numbers

Toll Free Numbers are available to you without a monthly service fee, but \$0.15 per minute will be charged to the customers' bill when toll free numbers are used.

This information is available in Spanish. Esta informacion es disponible Espanol.

**Response to Line3010
Santa Rosa Telephone Cooperative, Inc.
Study Area 442141**

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Santa Rosa Telephone Cooperative, Inc. ("SRTC") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 16-362, and that requests for such service are met within a reasonable amount of time. Details for how SRTC is meeting its obligations for its goals and required obligations are specified within the FCC Form 481 annual filing.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential. BORROWER NAME Santa Rosa Telephone Cooperative, Inc.
INSTRUCTIONS: Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December, 2015
		BORROWER DESIGNATION TX0559

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII

(Check one of the following)

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Kirk Petty

3/22/2016

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Recquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits		
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			52. Additional Paid-in-Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			55. Other Capital		
23. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

USDA-RUS

BORROWER DESIGNATION

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

TX0559

PERIOD ENDING

December, 2015

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or Margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

REDACTED – FOR PUBLIC INSPECTION

USDA-RUS

BORROWER DESIGNATION

TX0559

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

PERIOD ENDED

December, 2015

INSTRUCTIONS – See help in the online application.

PART I – STATEMENT OF CASH FLOWS

1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)

CASH FLOWS FROM OPERATING ACTIVITIES

2. Net Income

Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities

3. Add: Depreciation

4. Add: Amortization

5. Other (Explain)

Changes in Operating Assets and Liabilities

6. Decrease/(Increase) in Accounts Receivable

7. Decrease/(Increase) in Materials and Inventory

8. Decrease/(Increase) in Prepayments and Deferred Charges

9. Decrease/(Increase) in Other Current Assets

10. Increase/(Decrease) in Accounts Payable

11. Increase/(Decrease) in Advance Billings & Payments

12. Increase/(Decrease) in Other Current Liabilities

13. Net Cash Provided/(Used) by Operations

CASH FLOWS FROM FINANCING ACTIVITIES

14. Decrease/(Increase) in Notes Receivable

15. Increase/(Decrease) in Notes Payable

16. Increase/(Decrease) in Customer Deposits

17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)

18. Increase/(Decrease) in Other Liabilities & Deferred Credits

19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital

20. Less: Payment of Dividends

21. Less: Patronage Capital Credits Retired

22. Other (Explain)

23. Net Cash Provided/(Used) by Financing Activities

CASH FLOWS FROM INVESTING ACTIVITIES

24. Net Capital Expenditures (Property, Plant & Equipment)

25. Other Long-Term Investments

26. Other Noncurrent Assets & Jurisdictional Differences

27. Other (Explain)

28. Net Cash Provided/(Used) by Investing Activities

29. Net Increase/(Decrease) in Cash

30. Ending Cash

REDACTED – FOR PUBLIC INSPECTION